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March 11, 2009

VIA OVERNIGHT DELIVERY

Mr. Charles Terreni
Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

COPY
Posted: Ad
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Date: 3/12/09
Time: 3:40

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Re: BLC Management LLC d/b/a Angles Communication Solutions d/b/a Mexicall Solutions
Docket No. 2008-461-C

Dear Mr. Terreni:

Enclosed please find for filing an original and twenty-five (25) copies of the company's pre-filed testimony.

Ad I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Respectfully submitted,

Lance J.M. Steinhart
Attorney BLC Management LLC d/b/a Angles Communication Solutions d/b/a Mexicall Solutions

cc:

Lessie Hammonds – ORS via e-mail: lhammon@regstaff.sc.gov

Scott Elliott via e-mail: selliott@elliottlaw.us

Jackie Livingston via e-mail: jlivingston@elliottlaw.us

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DOCKET NO. 2008-461-C

**DIRECT TESTIMONY
OF BRIAN COX**

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1 **Q: PLEASE STATE YOUR NAME, YOUR POSITION WITH BLC**
2 **MANAGEMENT LLC D/B/A ANGLES COMMUNICATION SOLUTIONS**
3 **D/B/A MEXICALL SOLUTIONS AND YOUR BUSINESS ADDRESS.**

8 **Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND**
9 **AND EXPERIENCE.**

1

1

2 **Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

3 **A:** The purpose of my testimony is to demonstrate that BLC meets the state and
4 federal requirements for designation as an Eligible Telecommunications Carrier
5 (“ETC”) in the State of South Carolina in the designated areas of BellSouth
6 Telecommunications/AT&T South Carolina service territory (the “Designated
7 Service Area”). A List of Wire Centers is attached as Exhibit 1 to our application
8 filed in this Docket.

9 **Q: DOES BLC CURRENTLY PROVIDE TELECOMMUNICATIONS**
10 **SERVICE IN SOUTH CAROLINA?**

11 **A:** Yes. BLC was granted a Certificate of Public Convenience and Necessity to
12 Provide Competitive Local Exchange Telecommunications Services within the
13 State of South Carolina Pursuant to Order No. 2007-141 issued in Docket No.
14 2006-341-C on March 2, 2007. BLC is also a common carrier as that term is
15 defined in 47 U.S.C. §153(10), and BLC meets the requirements of 47 U.S.C. §
16 214(e)(1).

17 **Q: DOES BLC CURRENTLY CONTRIBUTE TO THE FUNDING FOR**
18 **UNIVERSAL SERVICE?**

19 **A:** Yes. Federal regulations require carriers such as BLC to contribute a portion of
20 their revenues to the funding of federal universal service.

1

2 **Q: IS THE COMPANY PRESENTLY ABLE TO DRAW FROM FEDERAL**
3 **UNIVERSAL SERVICE FUNDS FOR THE PROVISION OF THE**
4 **SUPPORTED SERVICES IN SOUTH CAROLINA?**

5 **A:** No. Until it is designated as an ETC for those areas it serves in South Carolina,
6 BLC is not able to receive any federal universal service funds to support its
7 provision of universal services to South Carolina consumers.

8 **Q: BY OBTAINING ETC DESIGNATION, WILL BLC IMPROVE THE**
9 **QUALITY OF BASIC SERVICE PROVIDED TO SOUTH CAROLINA**
10 **RESIDENTS?**

11 **A:** Yes. As required, if BLC receives ETC designation, any universal service funding
12 it receives will be used only to support the provision, upgrading and maintenance
13 of BLC's residential network where BLC is designated as an ETC in South
14 Carolina. As a result, BLC will be able to improve the quality of basic service by
15 increasing the availability of this unique service to customers who reside in areas
16 of the state where the service is currently unavailable and, due to credit and
17 deposit requirements, may not be able to obtain the safety and convenience of
18 telephone service from traditional providers.

19

20 **Q: WILL BLC'S CUSTOMERS EXPERIENCE OTHER BENEFITS AS A**
21 **RESULT OF BLC'S DESIGNATION AS AN ETC?**

22 **A:** Yes. Since BLC is seeking only low income support, and Lifeline is designed to
23 reduce the monthly cost of telecommunications services for eligible consumers,

1 and is distributed on a per-customer basis and is directly reflected in the price that
2 the eligible customer pays, it is assured that all support received by the carrier is
3 used to provide Lifeline services to consumers, thus promoting Lifeline and the
4 availability of telephone service to low income users, which is clearly in the
5 public interest.

6 **Q: IS A COMPETITIVE LOCAL EXCHANGE CARRIER LIKE BLC**
7 **ELIGIBLE FOR FEDERAL UNIVERSAL SERVICE SUPPORT?**

8 **A:** Yes. Both the 1996 Telecommunications Act ("TA'96") and the FCC's rules
9 establish the directives for the Commission to follow in making an ETC
10 designation. Section 214(e) of TA'96 specifically provides that any common
11 carrier, including a competitive local exchange carrier such as BLC, may be
12 designated as an ETC for federal universal service support purposes, provided
13 that carrier meets the specific criteria set forth in Section 214(e)(1) of the Act,
14 which BLC does.

15 **Q: WHAT ARE THE REQUIREMENTS FOR OBTAINING ETC**
16 **DESIGNATION?**

17 **A:** The eligibility requirements were recently supplemented by the FCC. The initial
18 requirements established by §214(e)(1) of the Act are still in place, and state:
19 A common carrier designated as an eligible telecommunications carrier under
20 paragraph (2) or (3) shall be eligible to receive universal service support in
21 accordance with section 254 and shall, throughout the service area for which the
22 designation is received:

1
2 (A) Offer the services that are supported by Federal universal service support
3 mechanisms under Section 254(c), either using its own facilities or a combination
4 of its own facilities and resale of another carrier's services (including the services
5 offered by another eligible telecommunications carrier); and

6
7 (B) Advertise the availability of such services and the charges therefore using
8 media of general distribution.

9
10 **Q: IS BLC REQUESTING DESIGNATION IN THIS PROCEEDING FOR**
11 **THE STUDY AREA OF ANY RURAL LEC IN SOUTH CAROLINA?**

12 **A:** No. BLC's Petition requests designation only in the wire centers of
13 BellSouth/AT&T which have been classified as non-rural.

14 **Q: DOES BLC CURRENTLY HAVE INTERCONNECTION AGREEMENT**
15 **WITH BELL SOUTH/AT&T?**

16 **A:** Yes.

17 **Q: IS IT YOUR UNDERSTANDING THAT BLC IS ENTITLED TO BE**
18 **DESIGNATED AS AN ETC IF IT DEMONSTRATES THAT IT IS**
19 **CAPABLE OF MEETING ALL OF THE OBLIGATIONS IMPOSED BY**
20 **SECTION 214(e) OF TA'96 AS WELL AS THE NEW REQUIREMENTS**
21 **ESTABLISHED BY THE FCC'S MARCH, 2005 ORDER?**

22 **A:** Yes. BLC has filed an Affidavit in support of its requirements for designation as
23 an Eligible Telecommunications Carrier as Exhibit 4 to our application filed in
24 this Docket.

1 **Q: THE FIRST CRITERION FOR ETC DESIGNATION UNDER**
2 **SECTION 214(e)(1) IS COMMON CARRIER STATUS. IS BLC A**
3 **COMMON CARRIER?**

4 **A:** Yes. BLC is a "common carrier" for purposes of obtaining ETC designation
5 under 47 U.S.C. § 214(e)(1). A common carrier is generally defined in 47 U.S.C.
6 §153(10) as "any person engaged as a common carrier for-hire" in interstate or
7 foreign communications utilizing either wire or radio technology, except for radio
8 broadcasters.

9 **Q: THE SECOND REQUIREMENT IS THAT BLC OFFER THE**
10 **"SUPPORTED SERVICES." WHAT ARE THE SUPPORTED SERVICES**
11 **THAT MUST BE OFFERED?**

12 **A:** The FCC has identified (at 47 C.F.R. §54.101(a)) the following services and
13 functionalities as the core services to be offered by an ETC and supported by
14 federal universal service support mechanisms:

- 15 1. voice-grade access to the public switched network;
- 16 2. local usage;
- 17 3. dual tone multi-frequency signaling or its functional equivalent;
- 18 4. single-party service or its functional equivalent;
- 19 5. access to emergency services;
- 20 6. access to operator services;
- 21 7. access to interexchange services;
- 22 8. access to directory assistance;
- 23 9. toll limitation for qualifying low-income consumers

1 **Q: CAN BLC CURRENTLY PROVIDE THE SUPPORTED SERVICES SET**
2 **FORTH ABOVE USING ITS NETWORK THAT IS IN PLACE TODAY?**

3 **A:** Yes. BLC's present network can provide all of the supported services to
4 consumers in South Carolina. BLC recognizes its obligation to offer these
5 services including the "toll limitation for qualifying low-income consumers"
6 service that is linked to the federal "Lifeline" program and targeted at meeting the
7 needs of low-income consumers. BLC, however, cannot participate in the federal
8 Lifeline program until it receives its ETC designation. Once BLC receives ETC
9 designation it will provide toll limitation as required by the FCC's rules.

10 **Q: COULD YOU EXPLAIN EACH OF THE SUPPORTED SERVICES AND**
11 **HOW BLC PROVIDES, OR WILL PROVIDE THESE SERVICES?**

12 **A:** Yes. BLC presently provides or plans to provide each of the supported services
13 identified by the FCC in 47 C.F.R. § 54.101(a) as follows:

14
15 a. *Voice-grade access to the public switched telephone network.* The
16 FCC has concluded that voice grade service means the ability to make and
17 receive phone calls, within a specified bandwidth and frequency range.
18 BLC meets this requirement by providing voice-grade access to the public
19 switched telephone network. Through its interconnection agreements, all
20 customers of BLC are able to make and receive calls on the public
21 switched telephone network within the specified bandwidth.

22 b. *Local usage.* ETCs must include local usage beyond providing
23 simple access to the public switched network as a part of a universal

1 service offering. BLC includes specified quantities of usage in its rate
2 plans and thereby complies with the requirement. It is important to note,
3 that currently, there is no specific rule that requires an ETC to include any
4 particular amount of local usage, although all of BLC' service offerings
5 include unlimited local calling.

6 c. *Dual-tone, multi-frequency ("DTMF") signaling or its functional*
7 *equivalent.* DTMF, more commonly known as touch-tone, is a method of
8 signaling that facilitates the transport of call set-up and detail information.
9 Through its interconnection agreements, BLC provides DTMF signaling
10 to its customers, which is the equivalent of that offered by the incumbent
11 LECs to its customers.

12 d. *Single-party service or its functional equivalent.* BLC meets the
13 requirement of single-party service by providing a dedicated message path
14 for the length of all customer calls.

1
2 e. *Access to emergency services.* The ability to reach a public
3 emergency service provider by dialing 911 is a requirement in any
4 universal service offering. BLC currently provides its subscribers access
5 to 911 emergency service in accord with this requirement, and consistent
6 with FCC Regulations throughout the service area for which designation
7 is sought. BLC also provides Enhanced 911 services including Phase I
8 and Phase II E911 services where requested by local public safety
9 authorities ready to receive the information and where the local exchange
10 carrier supports such services.

11 f. *Access to operator services.* Access to operator services is defined
12 as any automatic or live assistance provided to a consumer to arrange for
13 billing or completion, or both, of a telephone call. BLC currently provides
14 access to operator services through a 1-800 calling service. Customers can
15 also obtain 1+ service through a third party provider to access such
16 services.

17 g. *Access to directory assistance.* Much like operator services, BLC
18 currently offers access to directory assistance services through a 1-800
19 calling service. Customers can also obtain 1+ service through a third
20 party provider to access such services.

21 h. *Access to interexchange service.* BLC meets the requirements of
22 access to interexchange service by providing all of its customers with the
23 ability to make and receive interexchange calls through 1+800 calling

1 services provided by third party LD carriers. Additionally, customers can
2 obtain 1+ services through a third party provider, and are able to reach
3 their IXC of choice by dialing the appropriate access code.

4 i. *Toll limitation for qualifying low-income consumers.* As
5 previously mentioned, toll limitation for qualifying low-income
6 consumers is linked to participation in the Lifeline program, which BLC
7 will participate in and offer upon designation as an ETC. 47 CFR §
8 54.400(d) defines Toll Limitation” as either toll blocking *or* toll control
9 for telecommunications carriers that are incapable of providing both
10 services. At this time, BLC does offer toll control. Per the requirements of
11 47 CFR § 54.400(d) BLC will provide eligible Lifeline subscribers with
12 the ability to subscribe to toll blocking, at no additional charge, which
13 restricts the dialing of toll billed calls while permitting local calls, and
14 non-chargeable calls to company numbers such as repair service,
15 emergency numbers (911) and 800 dialing.

1

2 **Q: DOES BLC OFFER THE ABOVE-REFERENCED SUPPORTED**
3 **SERVICES VIA ITS OWN FACILITIES OR A COMBINATION OF ITS**
4 **OWN FACILITIES AND RESALE OF ANOTHER CARRIER'S**
5 **SERVICES?**

6 **A:** Depending on the type of service the customer requests and the precise location of
7 the customer, BLC offers the supported services either through the purchase of
8 switched port/loop combinations Unbundled Network Elements (UNEs) or
9 through resale of another carrier's services. Consistent with the requirements of
10 47 CFR. § 201(e), these facilities are physical components of the
11 telecommunications network that are used in the transmission or routing of the
12 services for which support is requested. Because these facilities include
13 unbundled network elements, they meet the FCC's definition of "own facilities"
14 established in 47 CFR § 201(f) and thereby make the method by which BLC
15 provisions the supported services consistent with the FCC's rules found at 47
16 CFR § 54.201(d)(1) through (i).

17 **Q: WILL BLC PROVIDE SUPPORTED UNIVERSAL SERVICES ONCE**
18 **DESIGNATED AS AN ETC?**

19 **A:** Yes. BLC will provide all supported universal services once designated as an
20 ETC.

1

2 **Q: WILL BLC PARTICIPATE IN THE LIFELINE AND LINK-UP**
3 **PROGRAMS IF IT IS DESIGNATED AS AN ETC?**

4 **A:** Yes, as we stated in our Petition, upon designation as an ETC, BLC will
5 participate in, and offer, LifeLine and Link-Up programs to qualifying low-
6 income consumers and publicize the availability of Lifeline and Link-Up services
7 in a manner reasonably designed to reach those likely to qualify for those
8 services, as required by 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d).

9 **Q: A THIRD REQUIREMENT FOR DESIGNATION AS AN ETC IS TO**
10 **ADVERTISE THE AVAILABILITY OF THE SUPPORTED SERVICES.**
11 **HOW DOES BLC INTEND TO ADVERTISE THE AVAILABILITY OF**
12 **THE SUPPORTED SERVICES?**

13 **A:** BLC advertises the availability of the supported services and the corresponding
14 charges in a manner that informs the general public within the designated service
15 area of both the services available and the corresponding charges. BLC advertises
16 its services through several different media of general distribution including (but
17 not limited to) marketing at targeted retail locations as well as advertisements via
18 television, radio, newspapers and various free publications target at low-income
19 consumers such as the "Dollar Saver". In addition, BLC will comply with the
20 requirements of 103-690(C) of the Commissions rules, which states that "carriers
21 seeking certification in areas not eligible for High Cost Support from the USF, but
22 seeking ETC designation for the purpose of participation in the Lifeline and Link
23 Up programs...has submitted a two-year plan that describes the carrier's plans for

1 advertising and outreach programs for identifying, qualifying, and enrolling
2 eligible participants in the Lifeline and link Up programs”.

3 **Q: IS BLC ABLE TO SATISFY EACH OF THE ADDITIONAL**
4 **REQUIREMENTS ESTABLISHED IN THE FCC’S MARCH 17, 2005**
5 **ORDER?**

6 **A:** Yes. BLC will provide each of the supported services identified in 47 C.F.R.
7 §54.101 as follows:

8 a. BLC will commit to provide service throughout its proposed designated
9 service area to all customers making a reasonable request for service. BLC
10 certifies that it will (a) provide service on a timely basis to requesting customers
11 within the applicant’s service area where the applicant’s network already passes
12 the potential customer’s premises; and (b) provide service within a reasonable
13 period of time, if the potential customer is within BLC’s licensed service area but
14 outside its existing network coverage, if service can be provided at reasonable
15 cost by reselling services from another carrier’s facilities to provide service.

16 b. Under FCC guidelines, an ETC Applicant must submit a five-year plan
17 that describes with specificity proposed improvements or upgrades to the
18 applicant’s network on a wire center-by-wire center basis throughout its proposed
19 Designated Service Area. The only circumstance warranting deviation from this
20 requirement is where an applicant’s requested ETC serving territory would qualify
21 it to receive no “high cost” USF support, but only “low income” USF support.
22 Because BLC seeks ETC designation solely for purposes of reimbursement for
23 provision of subsidized Lifeline and Link-Up services to eligible customers,

1 submission of a Five-Year Network Improvement Plan is not required at this time.

2 In lieu of this requirement, BLC will fully comply with the requirements of 103-
3 690(C) and has submitted BLC's two-year Lifeline and Link Up advertising plan
4 in it's Application for Certification as an Eligible Telecommunications Carrier. As
5 Lifeline support is designed to reduce the monthly cost of telecommunications
6 services for eligible consumers, and is distributed on a per-customer basis and is
7 directly reflected in the price that the eligible customer pays, it is assured that all
8 support received by the carrier is used to provide Lifeline services to consumers,
9 thus promoting Lifeline and the availability of telephone service to low income
10 users, which is clearly in the public interest.

11
12 c. Providing service to its customers through resale of another carrier's
13 services or the use of switched port/loop combination UNEs, leased from the
14 ILECs, allows BLC to provide to its customers the same ability to remain
15 functional in emergency situations as currently provided by the ILECs to their
16 own customers (including access to a reasonable amount of back-up power to
17 ensure functionality without an external power source, rerouting of traffic around
18 damaged facilities, and the capability of managing traffic spikes resulting from
19 emergency situations). Further, by nature of the fact that these services are
20 implicitly included in the rates that BLC pays to the ILECs, these capabilities are
21 also available to BLC's customers.

22 d. BLC will satisfy applicable consumer protection and service quality
23 standards. Under FCC guidelines, an ETC Applicant must demonstrate that it will

1 satisfy applicable consumer protection and service quality standards. 47 CFR
2 §54.202(a)(3); FCC ETC Order at Para 28. Applicant will satisfy all such
3 standards. As part of its certification requirements for providing local exchange
4 services, Applicant must abide by the service quality and consumer protection
5 rules. In addition, Applicant commits to reporting information on consumer
6 complaints per 1,000 lines on an annual basis consistent with the FCC's ETC
7 Order. Applicant in general commits to satisfying all such applicable state and
8 federal requirements related to consumer protection and service quality standards.

9 e. BLC's offering includes a local usage component with unlimited local
10 calling similar to the ILECs' basic local service offerings. The amount of credits
11 that will be provided to eligible low participating in the lifeline and link-up
12 program, is set forth in proposed tariff revisions, which was attached as Exhibit 2
13 to our Application in this Docket.

1
2 f. BLC acknowledges that the FCC may require it to provide equal access to
3 long-distance carriers in the event that no other eligible telecommunications
4 carrier is providing equal access within the service area.

5 g. As relevant to the Commission's public interest inquiry, BLC's presence
6 will undeniably include a benefit of increased customer choice, as BLC's service
7 offering is unique, and serves a specific sector of the public who might well not
8 otherwise have wire line telephone service.

9 h. BLC does not seek designation below the study area level of a rural
10 telephone company, and therefore, no "cream skimming" analysis is required.
11 Likewise, BLC does not seek designation as an ETC for any part of tribal lands.
12 Therefore, the public notice requirements established by the FCC for tribal lands
13 do not apply.

14 **Q: IN WHAT SERVICE AREAS IS BLC SEEKING DESIGNATION AS AN**
15 **ETC?**

16 **A:** Pursuant to Section 54.207 of the FCC's rules, a "service area" is a "geographic
17 area established by a state commission for the purpose of determining universal
18 service obligations and support mechanisms." 47 C.F.R. § 54.207(a). For service
19 areas served by non-rural ILECs such as BellSouth/AT&T, there are no
20 restrictions on how a Commission defines the "service area" for purposes of
21 designating a competitive ETC. BLC proposes a service area consisting of each
22 of the BellSouth wire centers in South Carolina which are set forth in Exhibit 1 to
23 our Application in this Docket.

1

2 **Q: DOES BLC PROVIDE TELECOMMUNICATIONS SERVICE**
3 **THROUGHOUT THE NON-RURAL ILEC SERVICE AREAS FOR**
4 **WHICH IT SEEKS ETC DESIGNATION?**

5 **A: Yes.**

6 **Q: BEFORE DESIGNATING BLC AS AN ETC, IS THE COMMISSION**
7 **REQUIRED TO FIND THAT THE DESIGNATION IS IN THE PUBLIC**
8 **INTEREST?**

9 **A: Yes.**

10 **Q: HOW, AND IN WHAT TERMS, WILL BLC'S PRESENCE AS AN ETC IN**
11 **SOUTH CAROLINA AFFECT THE MARKET AS A WHOLE AND THE**
12 **PUBLIC INTEREST GENERALLY?**

13 **A: A grant of BLC's application will serve the public interest and the market as a**
14 **whole by promoting additional deployment of BLC's unique local service. It is**
15 **important to note that most of BLC's customers do not meet the traditional**
16 **"creditworthiness" test of ILECs and CLECs, and therefore, many are unable to**
17 **obtain wire line local exchange service. BLC's designation as an ETC will bring**
18 **consumers the benefits of its unique service to a specific segment of the market.**
19 **Furthermore, A central purpose of the Telecommunications Act of 1996 was to**
20 **"promote competition and reduce regulation ... [thereby securing] lower prices**
21 **and higher quality services ... and encourage the rapid deployment of new**
22 **telecommunications technologies."**¹ Designation of BLC as an ETC would

¹ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat.

1 further these goals. Granting ETC status to BLC would allow the Company to
2 obtain federal universal service support, which it will use to offer innovative
3 telecommunications services at competitive prices to non-rural consumers in the
4 Designated Service Area.

5 **Q: IF BLC'S PETITION IS GRANTED, WILL THERE BE ANY FINANCIAL**
6 **IMPACT ON THE UNIVERSAL SERVICE FUND OR THE FEDERAL**
7 **UNIVERSAL SERVICE FUND SURCHARGE THAT SOUTH CAROLINA**
8 **END USERS PAY?**

9 **A:** No. In fact the amount of support available to an eligible subscriber is exactly the
10 same whether the support is given through a company such as BLC or the
11 Incumbent LEC operating in the same service area. As such designation of BLC
12 will not create any financial impact on the Universal Service Fund, the Federal
13 Universal Surcharge that South Carolina end users pay, or an increase to the State
14 or its political subdivisions.

15
16 **Q: HAS BLC BEEN GRANTED ETC STATUS BY ANY STATE**
17 **COMMISSIONS?**

18 **A:** Yes, BLC has been designated as ETC in the States of BLC was designated as an
19 ETC in the States of Alabama, Illinois, Kentucky, Louisiana, North Carolina and
20 Texas.

1

2 **Q: HAS BLC BEEN AUDITED BY USAC, OR ANY OTHER ENTITY,**
3 **PERTAINING TO LIFELINE AND LINK-UP?**

4 **A:** No.

5 **Q: DOES BLC AGREE TO COMPLY WITH ALL COMMISSION RULES**
6 **AND REGULATIONS REGARDING ETC, INCLUDING THOSE SET**
7 **FORTH IN DOCKET NO. 2006-37-C?**

8 **A:** Yes. Applicant hereby asserts its willingness and ability to comply with all the
9 rules and regulations that the Commission may lawfully impose upon Applicant's
10 provision of service contemplated by this application.

11 Applicant has requested ETC designation in wire centers located throughout, the
12 service area of BellSouth/AT&T South Carolina, a non-rural carrier.

13 Additionally, Applicant has limited its requested USF support to the federal USF
14 low income support program. Applicant certifies that all low income USF
15 funding it receives will be used to provide a credit to its Lifeline and Link-up
16 eligible customers, consistent with 47 CFR 54.403.

1
2 Applicant agrees to include in its quarterly Service Quality Report the number and
3 justification of applications held for more than 30 days and the number and
4 justification of applications that were denied. BLC will only seek direct low
5 income support from the Federal Universal Service Fund for the those line
6 provided through the use of its own facilities or through a combination of its own
7 facilities and the leased facilities of another carrier. Applicant agrees to utilize
8 the same qualifying criteria for Lifeline and Link-up as is offered in the BellSouth
9 territory (eligibility for TANF, Food Stamps, and Medicaid). Applicant agrees
10 that it will abide by all advertising and reporting and verification requirements
11 established by the FCC and Commission.

12 **Q: EXPLAIN HOW THE COMPANY'S RATES AND CHARGES ARE**
13 **COMPARABLE TO BELL SOUTH TELECOMMUNICATIONS/AT&T**
14 **SOUTH CAROLINA RATES AND CHARGES?**

15 **A:** Applicant agrees to provide Lifeline customers an additional \$3.50 credit in order
16 that the federal matching monies can be maximized. This will yield a Lifeline
17 credit of \$13.50 per month which is consistent with the credit offered throughout
18 BellSouth service area.
19

1
2 Should Applicant seek designation as an ETC for high cost support, Applicant
3 will file an additional and separate application with the Commission that
4 addresses all applicable state and federal laws, rules and regulations, including,
5 but not limited to, an appropriate build-out plan that includes the use of its own
6 facilities in addition to those obtained through commercial agreements to provide
7 services to un-served areas.

8 Applicant has submitted a two-year plan that describes the carrier's plans for
9 advertising and outreach programs for identifying, qualifying and enrolling
10 eligible participants in the Lifeline and Link Up programs.

11 Applicant shall comply will all applicable state and federal laws, rules, and
12 regulations regarding ETC designation and reporting requirements.
13

14 **Q: DOES THIS CONCLUDE YOUR TESTIMONY?**

15 **A:** Yes.

Exhibit A

Resume

Chris Melton
Technical Support Coordinator

Chris Manages the 35 staff technicians and coordinates and implements local order processing and all facets of troubleshooting every type of outage or repair issue. Technical skills include extensive use of LENS, PMAP, TAFI and CSOTS; working with Bellsouth Maintenance Group, LCSC, LENS Support Group, and LSM Group; knowledge of acquiring information from the LOH; Works daily with all long distance carrier backbones and all BellSouth resale issues and oversees all technical functions of the company.

Arturo Meija
Call Center Manager

In 2006, Arturo supervised the implementation of building a 400 person call center for Bellsouth from scratch. Arturo uses this experience along with his knowledge of call center management, performance reporting and technical expertise to ensure our customer service personnel are properly trained and motivated.

Edwin Leon
Online Support

Edwin monitors and manages all forms of online interactive customer service including email requests, support tickets that customers enter and our live chat software that offers live support from 8am-12pm Monday-Friday. These tools allow us to provide every possible avenue of customer service.

Andreas Salazar
Trouble Ticket and Outage Coordinator

Technical skills include extensive use of LENS, PMAP, and CSOTS; experience with calling into Bellsouth Maintenance Group, LCSC, LENS Support Group, and LSM Group; knowledge of acquiring information from the LOH; Manages technical support department which handles all outages and trouble issues.

Guillermo Santana
Order Department Coordinator

Technical skills include extensive use of LENS, PMAP, and CSOTS; experience with calling into Bellsouth Maintenance Group, LCSC, LENS Support Group, and LSM Group; knowledge of acquiring information from the LOH; Manages the new order department while working with local 911 validation officials to ensure quick installations.

Biographical Information

Brian Cox, President/CEO, LLC Member and Manager

Brian has successfully guided Angles through the turmoil and transitions of the CLEC industry over the last 3 years sticking to firm principles of efficient use of resources and customer service driven telecom products. Brian founded Angles in early 2001 to implement new internet and communication technologies. His philosophy of assembling an experienced and dedicated leadership team has proven to be extremely effective. Under Brian's leadership, Angles was awarded the Chamber of Commerce Rookie of the Year is on pace to hit \$4,000,000.00 in 2006. Prior to Angles, Brian served as an account executive for Lose Brothers Chemical, which was the regional distributor of Ortho Chemical. While he was there, he achieved the honor of having the highest increase in sales volume of any executive in the country 2 years in a row.

Danny Michael, Vice President

Danny has maintained positions of technology sales and management since 1996. His past expertise over the last decade lies mainly in an award winning sales background in wireless and landline telecom working with a full range of clients from Fortune 500 companies to local small business owners to individual retail based customers. Danny contains a full scale of qualities ranging from executive management, new sales prospecting and development, business administration, technical and telecom knowledge, and the strong ability to yield results. These qualities in conjunction with exceptional communication skills are what make Danny a clear asset and necessity to our companies' growth and overall success.

Robert Womack, Chief Financial Officer

Bob brings 19 years of accounting and bookkeeping experience to the Angles Team. Bob is a member of the Tennessee Society of Certified Public Accountants, the National Society of Accountants, and the Tennessee Association of Accountants, where he served as state President and currently serves on the Board of Governors. He has also served the Memphis Chapter of the Tennessee Association of Accountants as a member of the Board of Governors for four years and is a past Chapter President. For the 2003-04 chapter year, Bob was honored by being selected as the chapter's "Accountant of the Year" and for the 2004-05 year as the state's "Outstanding Accountant of the Year".

Steve Watson, Executive Telecom Consultant

Steve started the first certified CLEC in Pensacola, Florida. In business for 7 years, Steve pioneered the CLEC landscape and uses this valuable experience to consult Angles on data integrations and dispute/promotional management.

Kevin Murphy, Programmer

For 25 years, he has honed his skills in Systems Analysis and Development in both Telecom Back Office as well as Manufacturing systems. His analytical skills in system design, implementation expertise and billing platform knowledge are highly valued by Angles.

Chuck Campbell, Business Systems Manager

Chuck has more than 20 years of experience delivering a wide variety of back office and integrate3d communications solutions to cutting edge and world-class clients in the finance, telecom and e-business sectors.

Owen Vance, LLC Member and Manager

Angles will rely on the business management and ownership experience of LLC member and manager Owen Vance. Some of Owen's business dealings include purchasing Alexander Transfer Inc., an agent for Mayflower Transit, in 1999. This company is still thriving under his leadership. Owen also founded Vance and Richards Office Records Management in 1992. This company became extremely successful and was sold in 2003. Owen, like all 3 of our member/managers is also very involved in his church and giving back to the community.

Kevin Womack, LLC Member and Manager

Kevin currently serves as Memphis City President for First Bank. With over 17 years of banking experience, including Senior Vice President of Renasant Bank and Community Bank President of Bankcorp South Bank, Kevin's management experience along with his knowledge of finance strategies and banking tools will be extremely useful to Angles' expansion.

Mark Foster, Regulatory Attorney and Legal Counsel

Mark has over 15 years of experience in public utility and tariff regulation. He has been board certified in administrative law by the Texas board of Legal Specialization and is former counsel to the Public Utility Commission of Texas. Mark is a founder and partner in the Law Firm of Foster and Malish.

David J. Johnson, Corporate Attorney

Mr. Johnson of Johnson, Grusin and Surprise, P.C. has over 35 years of experience as a practicing corporate attorney for companies such as American Airlines. Mr. Johnson will assist in all corporate contracts and legal matters.

Jon Olivares, Executive Telecom Consultant

Jon brings over 15 years of telecom experience to the Angles Team. He has extensive knowledge of Central Office Switching Platforms along with managing all aspects of a sales portfolio. In 2000, Jon was in charge of every aspect, both personnel and financial, of the Network Telephone start up in West Tennessee and North Mississippi. He served as the area market manager and spearheaded account growth from zero to five hundred accounts in six months. Before leaving to head up the Network Telephone start up, Jon was the major account director for XO. He was responsible for \$1.6 million personally and over \$6 million total in monthly billing. Prior to XO, Jon was regional sales director for mass markets with MCI.